EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CAROL DOUGHERTY, : Case No. 1:04CV1682

Plaintiff :

Judge Kane

Exhibit 16

v.

;

CIBER, INC.,

:

Defendant

PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST REQUEST FOR ADMISSIONS DIRECTED TO PLAINTIFF

Plaintiff, Carol Dougherty, by and through counsel, Strokoff & Cowden, P.C., provides the following responses to Defendant's First request for Admissions Directed to Plaintiff:

1. On September 16, 2003, Plaintiff met with Ann Griffiths, CIBER Vice President.

RESPONSE: Admitted with qualification. It is admitted that Plaintiff met with Ann Griffiths, CIBER Vice President in mid-September of 2003. Although Plaintiff cannot document the exact date upon which this meeting occurred, it is her belief that this meeting occurred on September 18, 2003.

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11. Plaintiff failed to prepare anything for her sections of the October 23, 2003 meeting.

RESPONSE: Denied. Plaintiff prepared both handwritten notes and a completed HR/Recruiting Plan on her laptop for her sections of the meeting.

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14. On October 24, 2003, Plaintiff acknowledged to Ann Griffiths that she was totally unprepared for the office strategic planning meeting and had made no effort to inform Griffiths, prior to that meeting, of her lack of preparation.

RESPONSE: Denied. Plaintiff advised Ann Griffiths that she had been prepared for the office strategy planning meeting, and had the HR/Recruiting Plan on her laptop, which by then had been provided electronically. The reasons for limitations of the Recruiting Plan were discussed.